

UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION

IN RE:	§	
	§	
ALLAN L. REAGAN,	§	CASE NO. 20-11161-TMD
	§	
Debtor	§	CHAPTER 11

**DEBTOR'S MOTION FOR CONTINUANCE OF CONFIRMATION HEARING AND  
RELATED DEADLINES**

TO THE HONORABLE TONY M. DAVIS, UNITED STATES BANKRUPTCY JUDGE:

Allan L. Reagan (the “**Debtor**”) files this Motion for Continuance of Confirmation Hearing and Related Deadlines:

1. On October 22, 2020 (the “**Petition Date**”), the Debtor filed a voluntary petition for relief under chapter 11, title 11 of the United States Code (“**Bankruptcy Code**”).

2. By Order dated January 21, 2021 [Dkt. 59], the Court set a confirmation hearing for the Debtor’s proposed Plan of Reorganization for March 1, 2021. Additionally, the Court set deadlines for ballots and objections for February 22, 2021, and February 25, 2021 for the filing of the ballot summary and a response by the Debtor to any unresolved objections.

3. Debtor had agreed to attend a 2004 examination on February 19, 2021, and to produce documents. Though Debtor had assembled all documents by February 15, 2021, the power outages caused by the conditions in Austin, Texas made it impractical for Debtor’s counsel to process and label the documents for electronic production. Additionally, as of the time of filing of this Motion, Debtor’s counsel is still without power and the road conditions make it impossible to work at the firm’s offices, which are closed at this time.

4. Debtor has agreed to reset the 2004 examination. Additionally, Debtor has proposed a continuance of the confirmation hearing and related deadlines. The Subchapter V

Trustee and counsel for two creditors that Debtor's counsel was able to contact have agreed; Debtor's counsel has not heard from the office of the U.S. Trustee.

5. Debtor proposes the following modified deadlines:

March 22, 2021 at 2:25 p.m.: Confirmation hearing

March 15, 2021 at 5:00 p.m.: Deadline for ballots and objections to plan, and any election under Section 1111(b)

March 18, 2021: deadline for Debtor to file the ballot summary and any response to unresolved objections to confirmation.

WHEREFORE, the Debtor requests the Court grant this Motion, and grant the Debtor such other and further relief as is just and proper.

Respectfully submitted,

WALLER LANSDEN DORTCH & DAVIS, LLP

/s/ Mark C. Taylor

Mark C. Taylor (Bar No. 19713225)

William R. "Trip" Nix (Bar No. 24092902)

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*Attorneys for the Debtor and  
Debtor in Possession*

**CERTIFICATE OF SERVICE**

The foregoing was served on all persons on the attached Service List electronically via the Court's ECF service or via first class mail on this 18<sup>th</sup> day of February 2021.

/s/ Mark C. Taylor

Mark C. Taylor

## **SERVICE LIST**

### **Debtor**

Allan L. Reagan  
585 River Run  
Leander, TX 78641

### **Trustee**

Michael Colvard  
Weston Center  
112 East Pecan Street, Suite 1616  
San Antonio, TX 78205

### **Twenty-largest creditors:**

Madison/East Towne LLC  
c/o CBL & Associates  
2030 Hamilton Place Blvd.  
Chattanooga, TN 37421-6000

Village @ La Orilla  
Attn: Philip Lindborg  
12809 Donette Court N.E.  
Albuquerque, NM 87112

Martin S. Headley  
1500 Knobb Hill Lane  
Paoli, PA 19301

Comerica Bank  
Attn: Lesley B. Higginbotham, VP  
Special Assets Group - Texas Market  
P.O. Box 650282  
Dallas, TX 75265-0282

Ann E. Headley  
1500 Knobb Hill Lane  
Paoli, PA 19301

Wyndham Franchisor LLC  
22 Sylvan Way  
Parssipany, NJ 07054

Spain Family IX LLC  
c/o Patrick J. Spain  
11809 Oak Branch Dr.  
Austin, TX 78737

Bennett Living Trust  
Attn: Michael Bennett  
2321 Abbot Kinney Blvd.  
Venice, CA 90291

Gary J. Neumayer  
2201 Berrywood Lane  
Bloomington, IL 61704-2449

Headley Investments, LP  
1500 Knobb Hill Lane  
Paoli, PA 19301

Frances and Wayne Lee  
468 Jade Tree Lane  
Monterey Park, CA 91754

Capital One Spark Visa for Business  
P.O. Box 30285  
Salt Lake City, UT 84130-0285

Chase Ink Card for Business  
P.O. Box 15298  
Wilmington, DE 19850-5298

Ford Motor Credit Corp.  
P.O. Box 105704  
Atlanta, GA 30348

Comerica Bank  
Dept. #166901  
P.O. Box 55000  
Detroit, MI 48255-1669

Citicard Advantage Mastercard  
Cardmember Services  
P.O. Box 6062  
Sioux Falls, SD 57117

Discover Card  
Billing Inquiries  
P.O. Box 30943  
Salt Lake City, UT 84130

Chase Visa Mileage Plus  
P.O. Box 15298  
Wilmington, DE 19850-5298

Comerica Bank  
Attn: J.B. Stueckler, AVP  
300 W. Sixth Street  
Austin, TX 78701

### **Unsecured Creditors/ Interested Parties**

3401Hoteliers, LP  
Attn: Allan Reagan  
2000 S. IH-35, Suite Q11  
Round Rock, TX 78681

83<sup>rd</sup> Street Development, LLC  
Attn: Trent G. Moore  
9000 Cameron Parkway  
Oklahoma City, OK 73114

Action Propane  
2601 S. Hwy. 183  
Leander, TX 78641

ADT  
P.O. Box 660418  
Dallas, TX 75266

Al Clawson Disposal  
P.O. Box 416  
Jarrel, TX 76537

AT&T  
P.O. Box 5001  
Carol Stream, IL 60197

AT&T (DirectTV)  
P.O. Box 5014  
Carol Stream, IL 60197

Bank of Austin  
Attn: David H. Marks, SVP  
8611 N. Mopac Exp., Suite 101  
Austin, TX 78759

DT Chandler, LLC  
Attn: Bret Anderson, Manager  
140 E. Rio Salado Parkway, Unit 305  
Tempe, AZ 85281

FB Capital, LLC  
Attn: Allan Reagan  
2000 S. IH-35, Suite Q11  
Round Rock, TX 78681

Flix Brewhouse AZ, LLC  
Attn: Allan Reagan  
2000 S. IH-35, Suite Q11  
Round Rock, TX 78681

Flix Brewhouse Holdco, LLC  
Attn: Allan Reagan  
2000 S. IH-35, Suite Q11  
Round Rock, TX 78681

Flix Brewhouse Indiana, LLC  
Attn: Allan Reagan  
2000 S. IH-35, Suite Q11  
Round Rock, TX 78681

Flix Brewhouse Iowa, LLC  
Attn: Allan Reagan  
2000 S. IH-35, Suite Q11  
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Flix Brewhouse NM, LLC  
Attn: Allan Reagan  
2000 S. IH-35, Suite Q11  
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Flix Brewhouse OK, LLC  
Attn: Allan Reagan  
2000 S. IH-35, Suite Q11  
Round Rock, TX 78681

Flix Brewhouse SAT, LLC  
Attn: Allan Reagan  
2000 S. IH-35, Suite Q11  
Round Rock, TX 78681

Flix Brewhouse III, LLC (Mansfield)  
Attn: Allan Reagan  
2000 S. IH-35, Suite Q11  
Round Rock, TX 78681

Flix Brewhouse Texas IV, LLC  
Attn: Allan Reagan  
2000 S. IH-35, Suite Q11  
Round Rock, TX 78681

Flix Brewhouse Texas V, LLC  
Attn: Allan Reagan  
2000 S. IH-35, Suite Q11  
Round Rock, TX 78681

Flix Brewhouse TX II, LLC  
Attn: Allan Reagan  
2000 S. IH-35, Suite Q11  
Round Rock, TX 78681

Flix Brewhouse TX IV, LLC  
Attn: Allan Reagan  
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Flix Brewhouse Wi, LLC  
Attn: Allan Reagan  
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Flix Brewhouse, LLC  
Attn: Allan Reagan  
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Flix Entertainment, LLC  
Attn: Allan Reagan  
2000 S. IH-35, Suite Q11  
Round Rock, TX 78681

Hospitality Investors, Inc.  
Attn: Allan Reagan  
2000 S. IH-35, Suite Q11  
Round Rock, TX 78681

Internal Revenue Services  
Centralized Insolvency Office  
P.O. Box 7346  
Philadelphia, PA 19101-7346

Janet L. Reagan  
585 River Run  
Leander, TX 78641

Kathleen R. McCormick  
6801 Greenwood Ave., Unit 210  
Seattle, WA 98103

Lone Star National Bank  
Attn: Sergio Gonzalez, 1<sup>st</sup> VP  
2100 Boca Chica Blvd.  
Brownsville, TX 78520

Merle Hay Investors LLC  
c/o Abbell Credit Corporation  
30 N. LaSalle St., Suite 2120  
Chicago, IL 60602

Mikeska Monahan & Peckham, P.C.  
100 Congress Ave., Suite 990  
Austin, TX 78701

Pedernales Electric Company  
P.O. Box 1  
Johnson City, TX 78636

Poolwerx by Blue Bottom Pool Supply  
3021 S. IH35, Suite 140  
Round Rock, TX 78664

Prudential Mortgage Capital Company LLC  
c/o Prudential  
100 Mulberry St., Gateway Center 4  
8<sup>th</sup> Floor  
Newark, NJ 07102

ROP Artcraft LLC  
Attn: Adam Frank  
5678 N. mesa St.  
El Paso, TX 79912

Round Rock Business Park, LLC  
Attn: Allan Reagan  
2000 S. IH-35, Suite Q11  
Round Rock, TX 78681

RPT Realty, L.P.  
19 W. 44<sup>th</sup> Street, Suite 1002  
New York, NY 10036

Securian/Minnesota Life Insurance Co.  
c/o Trinity Real Estate Finance  
100 NE Loop 410, Suite 972  
San Antonio, TX 78216

Southwestern Retail Properties II, LP  
Attn: Allan Reagan  
2000 S. IH-35, Suite Q11  
Round Rock, TX 78681

Southwestern Retail Properties III, LP  
Attn: Allan Reagan  
2000 S. IH-35, Suite Q11  
Round Rock, TX 78681

Southwestern Retail Properties LP  
Attn: Allan Reagan  
2000 S. IH-35, Suite Q11  
Round Rock, TX 78681

Spectrum  
P.O. Box 60074  
City of Industry, CA 91716-0074

UBS Real Estate Securities, Inc.  
c/o Berkadia Commercial Mortgage LLC  
6955 Union Park Center, Suite 450  
Midvale, UT 84047

U.S. Trustee  
903 San Jacinto, Suite 230  
Austin, TX 78701

Wells Fargo Auto  
MAC T9017-026  
P.O. Box 168-48  
Irving, TX 75016-8048

Williamson County Tax Office  
904 S. Main Street  
Georgetown, TX 78626

**Parties Filing Claims**

Discover Bank/Discover Products  
PO Box 3025  
New Albany, OH 43054-3025

JPMorgan Chase Bank, N.A.  
c/o National Bankruptcy Services LLC  
P.O. Box 9013  
Addison, TX 75001

Capital One Bank (USA) N.A.  
By American InfoSource as agent  
4515 N. Santa Fe Ave.  
Oklahoma City, OK 73118

Madison/East Towne, LLC  
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**Parties Requesting Notice**

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